

The Honorable Robert S. Lasnik

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON**

BRUCE KEITHLY; DONOVAN LEE; and  
EDITH ANNA CRAMER, individually and  
on behalf of all others similarly situated,

Plaintiffs,

v.

INTELIUS, INC. et al.,

Defendants.

Case No: 09-cv-01485-RSL

**SUPPLEMENT TO MOTION OF  
LAURENCE D. PASKOWITZ TO  
CONSOLIDATE RELATED  
ACTIONS AND FOR  
APPOINTMENT OF LEAD  
PLAINTIFF AND LEAD  
COUNSEL**

NOTE ON MOTION CALENDAR:  
June 18, 2010

AND RELATED CASES

Plaintiff Laurence D. Paskowitz ("Paskowitz") has moved for an Order: (a) consolidating the three above-captioned related class action cases involving alleged misconduct by defendant Intelius, Inc. ("Intelius") and others acting in concert with it; (b) appointing Paskowitz as lead plaintiff for these actions; and (c) appointing his counsel as lead counsel (or, alternatively, as one of no more than two co-lead counsel) (the "Motion") (Dkt. No. 60).

At the time of the Motion, Counsel was unaware of the Court's May 28, 2010 Order appointing the firms of Cohen Milstein Sellers & Toll P.L.L.C. and Keller Rohrback L.L.P as lead counsel and their clients as lead plaintiffs. The issues raised by Plaintiff Paskowitz's Motion indicate that the current lead status be re-examined in light

1 of the significant issues raised in the Motion and the claims asserted in the Paskowitz  
 2 Complaint which were never asserted by current counsel.

3 Accordingly, Plaintiff Paskowitz respectfully requests that the Motion be  
 4 considered as a request for reassessment of the current lead counsel and lead plaintiff  
 5 appointments and for a modification of the May 28, 2010 Order.

6 In the alternative, should the Motion not be granted, Paskowitz respectfully  
 7 requests that the Court treat the Motion as a request for Intervention as of right pursuant  
 8 to Rule 24(a) of the Federal Rules of Civil Procedure. Paskowitz relies on his Complaint  
 9 as the Complaint in Intervention.

10 Dated this 4th day of June, 2010.

11 Respectfully Submitted,

12  
 13 By:



14 \_\_\_\_\_  
 15 Derek Linke, WSBA No. 38314  
 16 John Du Wors, WSBA No. 33987  
 17 **NEWMAN & NEWMAN,**  
 18 **ATTORNEYS AT LAW, LLP**  
 19 505 Fifth Avenue South, Suite 610  
 20 Seattle, WA 98104  
 21 Telephone: (206) 274-2800  
 22 Facsimile: (206) 274-2801  
 23 Email: linke@newmanlaw.com  
 24 Email: duwors@newmanlaw.com

25 Brian M. Felgoise (*pro hac vice* to be filed)  
 26 **FELGOISE LAW FIRM**  
 27 261 Old York Rd. Suite 518  
 28 Jenkintown, PA 19046  
 Telephone: (215) 886-1900  
 Facsimile: (215) 886-1909  
 Email: felgoiselaw@verizon.net

Roy Jacobs (*pro hac vice* to be filed)  
**ROY JACOBS & ASSOCIATES**  
 One Grand Central Place  
 60 East 42nd Street 46th Floor  
 New York, NY 10165  
 Telephone: (212) 867-1156  
 Facsimile: (212) 504-8343  
 Email: rjacobs@jacobsclasslaw.com